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LEKK OF DISTRICT COURT

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FILED

Kazda Law Firm Kraig C. Kazda 600 Central Plaza, Suite 316 Great Falls, MT 5940-1629 Attorney for Plaintiff

IN THE EIGHT JUDICIAL DISTRICT, CASCADE COUNTY

Mary Hughes

Plaintiff,

Cause NoDV -13- 410

Gregory G. Pinaki

-VS-

* COMPLAINT AND DEMAND

Joseph Gertge, IT Services Corp, Inconen Corporation, Inconen Temporary Services, Inc * FOR JURY TRIAL The Boeing Company, and John Does I. II and III. Defendants.

COME NOW Plaintiff, and demanding a trial by jury on all claims set forth herein, allege for her Complaint as follows:

- 1. That on June 3rd, 2010, the Plaintiff was driving West on Smelter Avenue traveling through the intersection of Wire Mill Road in Black Eagle, Montana.
- 2. At the aforementioned time and place, the Defendant, Joseph Gertge , was traveling east on Smelter

Avenue traveling through the intersection of Wire Mill Road in Black Eagle, Montana.

- 3. At the aforementioned time and place, Defendant, Joseph Gertge, failed to yield the right of way to Plaintiff, Mary Hughes, causing a collision between Mr. Gertge's vehicle and Ms. Hughes' vehicle.
- 4. As a result of Defendant, Joseph Gertge's negligence, Ms. Hughes sustained serious bodily injury.
- 5. At the aforementioned time and place, the Defendant, Joseph Gertge, was acting within the course and scope of his employment with his employers IT Services Corp, Inconen Corporation, Inconen Temporary Services, Inc, the Boeing Company and John Does I, II, and III.
- 6. That the Defendants, IT Services Corp, Inconen Corporation, Inconen Temporary Services, Inc, the Boeing Company, and John Does I, II, and III through the negligent acts and omissions of its employee, Joseph Gertge, as set forth in preceding paragraphs of this complaint was negligent in failing to yield the right of way to Ms. Hughes and in failing to operate the vehicle being driven by Joseph Gertge in a careful and prudent manner as required by Mont. Code Ann. 61-8-342.
 - 7. As a result of Defendants negligent acts, Plaintiff

was injured.

Wherefore, Plaintiff demands as follows:

- 1. For costs and disbursements incurred;
- 2. For damages sufficient to compensate Plaintiff for all injuries she suffered as a result of the June $3^{\rm rd}$, 2010 incident.
- 3. For such other and further relief as this Court may deem just and proper.
 - 4. For a trial by jury in this matter.

Dated this 22nd day May 2013.

Kraig C. Kazda

600 Central Plaza, 316

Great Falls, MT 59401

Attorney for Plaintiff